

September 29, 2018

Reply to REC Networks Comments to Proceeding 18-227

I write to support, in part, the September 24, 2018 Comments of **REC Networks**, filed in Proceeding 18-227.

In particular, I strongly endorse REC's recommendation that the television Channels 5 and 6 spectrum be 'repurposed' as an all-digital replacement for all AM stations in the United States.

I previously submitted Comments, in **Proceeding 17-105**, calling for the same thing, of shutting down all U.S. AM stations and moving them to the Channels 5 and 6 bandwidth. I will not fully restate those prior Comments.

In my Comments in the 'modernization' **Proceeding 17-105**, I suggested the assignment of particular channels in the '5 and 6' bandwidth for the AM and the different FM services. For example, a certain number of contiguous channels would be assigned to all of the AM stations, some to low-power FMs, others to NCE FMs, etc. REC Networks, in its September 24, 2018 Comments, did excellent work by actually assigning nearly every AM station a proposed particular, new frequency in the Channels 5 and 6 bandwidth.

REC also correctly noted that it is grossly inefficient to maintain the Channels 5 and 6 spectrum for a very few number of full-power and Class A broadcast television stations, when that bandwidth could be far more constructively reassigned to AM radio stations and the different FM radio services. Even with the paring down of assigned spectrum for digital TV stations, at and below Channel 51, the same computer programs and software that the FCC and Media Bureau used to reassign digital television channels, as part of the 'repack' process, could certainly be used to find new digital channels for all TV channels – full-power, Class A, and low power – currently operating on Channels 5 and 6.

In fact, to assist in that effort, I would further propose that TV Channels 2, 3 and 4 be assigned for the low-power and translator television services, to free up spectrum for the 'repacking' of all full-power and Class A television stations. As an important reminder, LPTVs and translators are classified as secondary services, and are not protected from the needs of full-power and

Class A television stations. It is also worth noting, importantly, that the Channels 5 and 6 spectrum, located in the 'Low VHF' bandwidth, is not technically suitable for the full-power and Class A televisions that are currently operating there. Hence, it makes rational sense to move all television services, primary and secondary, entirely off of the 76.1 MHz to 87.9 MHz spectrum.

I very respectfully assert to Chairman Pai and the Commissioners that the 'AM revitalization' efforts are not a viable solution, at all, for two reasons. First, many radio industry engineering and other professionals firmly believe that the AM band is beyond repair from the 'noise floor' interference that plagues the AM stations. There are simply too many electrical and electronic devices and sources that are severely degrading AM broadcasting and signals. It is entirely too late to reverse or mitigate this interference that has weakened the effective strength and clarity of AM signals.

Second, 'AM revitalization' has, in turn, degraded the incumbent FM band – 88.1 MHz to 107.9 MHz – by jamming cross-service FM translators onto FM radio spectrum that was already crowded with the addition, in recent years, of thousands of Low-power FMs, translators for full-power FM stations, and FM boosters. Such a 'shoehorning' policy is very unfair to the radio broadcasters who spent hundreds of thousands or millions of dollars for their full-power FM stations. It makes no sense to foist damage onto the FM band to try to ameliorate the damage that ruined the AM band.

So, again, as proposed by REC Networks and others, please give very serious consideration to converting the television Channels 5 and 6 spectrum into a new, all-digital FM band, to provide relief to both AM and incumbent FM station owners and operators. The FCC and Media Bureau mandated the conversion of TV stations to digital broadcasting, and should do the same with shutting down all AM stations and moving them to the '5 and 6' broadcasting space.

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